

TSD File Inventory Index

Date: November 23, 1999

Initial: CM Kerner

Facility Name: <u>Plascon Electronic Products, Inc.</u>			
Facility Identification Number: <u>CHP 094 904</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status <u>A.2</u>	/	.1 Correspondence	
.1 Correspondence	y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	y	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	y	C.2 Compliance/Enforcement <u>C.2</u>	/
.4 Financial Insurance (Sudden, Non Sudden)	x	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests	x	.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
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.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence <u>A.4.1-A.4.2-A.4.5</u>	/	.4 RFA Reports <u>D.1.4</u>	/
.2 Closure/Post Closure Plans, Certificates, etc <u>See A.4.1</u>		D.2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
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Total - 6

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil Sampling/Groundwater D.2.7(2)	2	D.5 Corrective Action/Enforcement	
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.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
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.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
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.7 Lab Data, Soil Sampling/Groundwater		.2 Compliance and Enforcement	
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.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: _____



Re: Lucas County
Hazardous Materials
Plaskon Products, Inc.
HWFAB #08-48-0143

Mr. Robert H. Wholf, Manager Env. Services
Plaskon Products, Inc.
2829 Glendale Avenue
Toledo, Ohio 43614

February 16, 1982

Dear Mr. Wholf:

On February 4, 1982, Tom Wray and Dave Ferguson, Ohio EPA Northwest District Office, conducted an inspection of your facility which was represented by yourself. The facility was found to be in compliance with all applicable State and federal regulations.

A copy of the form completed during the inspection is enclosed. If you have any questions about the inspection, please call me at 352-8461.

Sincerely,

A handwritten signature in cursive script, appearing to read "David L. Ferguson".

David L. Ferguson
Environmental Scientist

DLF:sd

Encl.

cc: Kathy Homer, U.S. EPA, Region V w/encl.
cc: Paula Cotter, DHM, C.O. w/encl.
cc: Peggy Vince, HWFAB w/encl.

RCRA INTERIM STATUS INSPECTION FORM

U.S. EPA I.D. NO. OH D 00504724

PART 1. GENERAL INFORMATION

Facility: Plaskon Products, Inc. Address: 2829 Glendale Ave City: ToledoState: OH Zip Code: 43614 County: LUCAS Telephone: 419-382-5611Facility Operator: Same Title: _____ Telephone: _____Facility Owner: Same Address: _____

City: _____ State: _____ Zip Code: _____ Telephone: _____

Type of Ownership: ☒ Private _____ Government _____ State HWFAB No. 08-48-0143Date of Inspection: 2-4-82 Time of Inspection: (Start) PM (Finish) PMAdvance Notification? ☐ No ☒ Yes: _____Weather Conditions: Clear, Cold (12° high For Day), 2ft. snow on ground

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Robert H. Wholf</u>	<u>Mgr., Env. Services</u>	<u>419-389-5612</u>
2.	<u>Doug McKee</u>	<u>Supr., Ind. Hygiene & Safety</u>	<u>419-389-5685</u>
3.	_____	_____	_____
4.	_____	_____	_____

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INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>Dave Ferguson</u>	<u>EST II, OEPA</u>	<u>419-352-8461</u>
2.	<u>Tom Wray</u>	<u>HW S I, " "</u>	<u>" "</u>
3.	_____	_____	_____
4.	_____	_____	_____

1. Type(s) of hazardous waste site activity: A. _____ Generation B. ☒ Storage C. _____ Treatment
D. _____ Transportation E. _____ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: Urea-Formaldehyde mostly

b) Non-Listed Wastes: D001 ^I D002 ^C D003 ^R D000 ^T

3. Has this facility submitted a Part A Permit Application? ☒ Yes _____ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

_____ Yes, See Remark # _____ ☒ No

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5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ☒ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ☒ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

Mfg. Thermoset molding compounds which are dry powders, granules or pellets sold to customers who mold elec. connectors, switchgear, & closures from these mats.

Molding compounds consist primarily of mixtures of finest fillers such as cellulose or silica mixed w/ resins such as urea-form, polyester or epoxy resins & colorants.

REMARKS, PART 1. (GENERAL INFORMATION)

#1 There is only 20 pounds of lab waste on-site. No H.W. has been shipped since before the last OEPA visit on 7-22-81. In the summer the urea-form. tanks are cleaned out by a private contractor. Most of it is recycled, however some is H.W. Last Summer's manifests meet all requirement.

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PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u>X</u>	<u> </u>	<u> </u>	<u>#1</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>X</u>	<u> </u>	<u> </u>	<u>#1</u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>X</u>	<u> </u>	<u> </u>	<u>#1</u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>X</u>	<u> </u>	<u> </u>	<u>#1</u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>X</u>	<u> </u>	<u> </u>	<u>#1</u>

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	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	X	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	X	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	X	—	—	—
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	X	—	—	#2 Will be sent
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	X	—	—	as required by state law
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	—	—	X	—
8. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:				
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	X	—	—	—

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	—	—	<u>X</u>	—
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u>X</u>	—	—	<u>Daily</u>
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	—	—	<u>X</u>	—
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	—	—	<u>X</u>	—
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	—	—	<u>X</u>	—
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	—	—	<u>X</u>	—
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	—	—	<u>X</u>	—
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u>X</u>	—	—	—
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u>X</u>	—	—	—

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?	___	___	___	___
c) Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?	___	___	___	___
9. Does the transporter store hazardous wastes temporarily while they are in transit?	___	___	___	___
a) Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	___	___	___	___

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?	___	___	___	___
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	___	___	___	___

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

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PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	<u>X</u>	—	—	<u>Daily</u>
a) Inspect emergency equipment.	<u>X</u>	—	—	—
b) Inspect monitoring equipment.	<u>X</u>	—	—	—
c) Inspect security, alarm and communications devices.	<u>X</u>	—	—	—
d) Inspect process equipment (pipes, pumps, etc.).	<u>X</u>	—	—	—
e) Inspect containment structures (dikes, curbs, etc.).	<u>X</u>	—	—	—
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<u>X</u>	—	—	—
g) Inspect hazardous waste handling/loading areas each day used.	<u>X</u>	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	<u>X</u>	—	—	—
i) Record of any hazardous waste discharges.	<u>X</u>	—	—	—
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u>X</u>	—	—	—
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<u>X</u>	—	—	—
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<u>X</u>	—	—	—

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>X</u>	—	—	—
b) Physical separation of incompatible waste materials.	<u>X</u>	—	—	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	—	—	—
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u>X</u>	—	—	—

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	—	<u>✓</u>	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>X</u>	—	—	—
a) Internal alarm system	<u>X</u>	—	—	—
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	—	—	—
c) Portable fire control equipment.	<u>X</u>	—	—	—
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>X</u>	—	—	—
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>✓</u>	—	—	—
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>X</u>	—	—	—

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>X</u>	—	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>X</u>	—	—	—
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	—	—	<u>X</u>	—

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u>X</u>	—	—	—
a) Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	—	—	—
b) Arrangements or agreements with local or state emergency authorities.	<u>X</u>	—	—	—
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u>X</u>	—	—	—
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u>X</u>	—	—	—
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>X</u>	—	—	—
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u>X</u>	—	—	—

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<u>X</u>	—	—	—
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<u>X</u>	—	—	—
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	—	—	<u>X</u>	—

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<u>X</u>	—	—	—
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<u>X</u>	—	—	—
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u>X</u>	—	—	—
c) The estimated (or actual) weight, volume or density of the waste material(s).	<u>X</u>	—	—	—
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<u>X</u>	—	—	—

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	Yes	No	N/A	Remark #
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	#3 will be sent as rec'd by state law
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	#3

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
--------------------------	--------------------------	-------------------------------------	--

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	<u>X</u>	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	<u>X</u>	_____	_____	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	<u>X</u>	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	<u>X</u>	_____

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	—	—	—	—
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	—	—	—	—

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	X	—	—	—
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	X	—	—	—
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55, -56, -57, -58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	X	—	—	—
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	X	—	—	—
d) A description of steps taken to decontaminate facility equipment.	X	—	—	—
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	—	—	X	—
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	—	—	X	No Amendment Nec.

RCRA INTERIM STATUS INSPECTION FORM

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
___	___	<u>X</u>	___
___	___	<u>X</u>	___
___	___	<u>X</u>	___
___	___	<u>X</u>	___
___	___	<u>X</u>	___

3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.

4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.

a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.

b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).

c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.

6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.

7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.

8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.

___	___	___	___
___	___	___	___
___	___	___	___
___	___	___	___

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

— — — —

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

X — — —

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53).	<u>X</u>	—	—	—
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u>X</u>	—	—	—

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	—	—	<u>X</u>	—
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	—	—	<u>X</u>	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	<u> </u>	<u> </u>	<u> </u>	<u> </u>
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	<u> </u>	<u> </u>	<u> </u>	<u> </u>
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	<u> </u>	<u> </u>	<u> </u>	<u> </u>
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	<u> </u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).	_____	_____	_____	_____
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.	_____	_____	_____	_____
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	_____	_____	_____	_____
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).	_____	_____	_____	_____
8. Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79).	_____	_____	_____	_____
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77).	_____	_____	_____	_____

Subpart K: Surface Impoundments

1. The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Sections 265.222 and 3745-57-03).	_____	_____	_____	_____
2. Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22 and 3745-57-04).	_____	_____	_____	_____



Re: Application Number 81-HW-0143
Lucas County

August 24, 1981

Robert Wholf
Manager, Environmental Service
Plaskon Products
2829 Glendale Avenue
Toledo, Ohio 43614

Dear Mr. Wholf:

On July 22, 1981, Dave Ferguson of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Robert Wholf.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Paul Flanigan", is written over the typed name.

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Dave Ferguson, NWDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 81-HW-0143
 OWNER - Plaston Products, Inc.
 FACILITY NAME - Plaston Products, Inc.
 FACILITY LOCATION - 2829 Glendale Ave., Toledo, Ohio
 FACILITY CONTACT - Robert Whaley, Mgr., Env. Services PHONE NO. - (419) 382-5611
 ISS INSPECTION DATE - 7-22-81

	COLUMN I	COLUMN II	COLUMN III	COLUMN IV	COLUMN V	COLUMN VI
Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
	4	"	"			
4	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E 1	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53			
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
VI	A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"			
	g	"	"			
9	VII A 1	3745-56-03	265.112	265.112		
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142	B		
	B 1	3745-56-09	265.118			
VIII	I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265-192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265-193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A 1	3745-57-72	265.302		
		2	"	"		
		3	"	"		
		4	"	"		
	B	1	3745-57-79	265.309		
		2	"	"		
	C	1	3745-56-03	265.112		
		2	"	"		
		3	"	"		
		4	3745-56-32	265.192		
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
	E	1	3745-57-83	265.313		
		2	3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
		2	"	"		
		3	"	"		
		4	"	"		
16	G	1	3745-57-85	265.315		
		O&P				
	I	B 1	3745-58-33	265.373		
		2	"	"		
		3	"	"		
		4	"	"		
	II	A 1a	3745-58-35	265.375		
		b	"	"		
		c	"	"		
		2a	3745-58-35	265.375		
		b	"	"		
17	B	1	"	"		
		2	"	"		
		3	"	"		
		4	"	"		
		5	"	"		

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	3745-52-42	262.42			
	(C) 8	3745-52-42	262.42			
	2 (A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

EPA IDENTIFICATION NUMBER

87-HL 0143

EPA IDENTIFICATION NUMBER

014D 0050 4724

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: Plushon Products Inc.
- (B) Street: 2229 Glendale Ave.
- (C) City: Tolide (D) State: CA (E) Zip Code: 93614
- (F) Phone: 449-387-5611 (G) County: Lucas
- (H) Operator: _____
- (I) Street: _____
- (J) City: _____ (K) State: _____ (L) Zip Code: _____
- (M) Phone: _____ (N) County: _____
- (O) Owner: _____
- (P) Street: _____
- (Q) City: _____ (R) State: _____ (S) Zip Code: _____
- (T) Phone: _____ (U) County: _____
- (V) Date of Inspection: 7-27-81 (W) Time of Inspection (From) _____ (To) _____
- (X) Weather Conditions: Mid 60's Sunny

(Y) Person(s) interviewed	Title	Telephone
<u>Robt. Whelf</u>	<u>Mgr, Env. Sec</u>	
(Z) Inspection Participants	Agency/Title	Telephone
<u>Alice Ferguson</u>		
<u>Tom Wray</u>		
(AA) Preparer Information		
Name	Agency/Title	Telephone

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><u> </u> A. Storage and/or Treatment</p> <p> <u> </u> 1. Containers (I)</p> <p> <u> </u> 2. Tanks (J)</p> <p> <u> </u> 3. Surface Impoundments (K)</p> <p> <u> </u> 4. Waste Piles (L)</p> <p><u> </u> B. Land Treatment (M)</p> <p><u> </u> C. Landfills (N)</p> | <p><u> </u> D. Incineration and/or Thermal Treatment (O and P)</p> <p><u> </u> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>N/A</u>	—	—	_____
2. Facility expansion?	<u>N/A</u>	—	—	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	—	—	<u>James & Henry</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	—	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>X</u>	—	—	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>X</u>	—	—	_____
2. Artificial or natural barrier around facility?	<u>X</u>	—	—	_____
3. Controlled entry?	<u>X</u>	—	—	_____
4. Danger sign(s) at entrance?	<u>X</u>	—	—	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>X</u>	—	—	_____
2. Records of operator error?	<u>X</u>	—	—	_____
3. Records of discharges?	<u>X</u>	—	—	_____

II. GENERAL FACILITY STANDARDS - continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	<u>Daily</u>
5. Safety, emergency equipment?	<u>X</u>	---	---	
6. Security devices?	<u>X</u>	---	---	
7. Operating and structural devices? <u>Walls</u> <u>perimeter</u>	<u>X</u>	---	---	
8. Inspection log?	<u>X</u>	---	---	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	---	---	
2. Job descriptions?	<u>X</u>	---	---	
3. Description of training?	<u>X</u>	---	---	
4. Records of training?	<u>X</u>	---	---	
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	---	---	
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>X</u>	---	---	
2. No smoking signs?	<u>X</u>	---	---	
3. Separation and protection from ignition sources?	<u>X</u>	---	---	

*Not Inspected

(E) Is there adequate aisle space
for unobstructed movement?

X

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the
following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X

X

X

X

X

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

— X —

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

X — —

2. Telephone or 2-way radios at the scene of operations?

X — —

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X — —

Indicate the volume of water and/or foam available for fire control:

6,000 / 7,000 gpm own water tank

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

X — —

2. Is emergency equipment maintained in operable conditions?

X — —

Have a Full time

Fire mechanic &

twice / yr. Fire

Inspection

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

X — —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	___	___	
 (C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	___	___	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	___	___	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	___	___	
 (D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	___	___	<u>NI</u> <u>X</u>	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>X</u>	___	___	
2. Are records of past shipments retained for 3 years?	<u>X</u>	___	___	
 (B) Does the owner or operator meet requirements regarding manifest discrepancies?				
	<u>X</u>	___	___	

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X _____

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X _____

- c. The location and quantity of each hazardous waste within the facility?

X _____

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A _____

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

X _____

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>		<u>OK</u>	<u>see letter in file</u>
2. Has this plan been submitted to the Regional Administrator	<u>X</u>			
3. Has closure begun?	<u>X</u>			
4. Is closure estimate available by May 19, 1981?	<u>X</u>			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			<u>N/A</u>	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

**I
USE AND MANAGEMENT OF CONTAINERS**

Facility Name: GLASKON PRODUCTS Date of Inspection: 7/22/81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>			
2. Are containers compatible with waste in them?	<u>X</u>			
3. Are containers stored closed?	<u>X</u>			
4. Are containers managed to prevent leaks?	<u>X</u>			
5. Are containers inspected weekly for leaks and defects?	<u>X</u>			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>X</u>			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>NI</u>	<u>X</u>	---	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>NI</u>	<u>X</u>	---	-----

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	-----
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	-----
5. Are required daily and weekly inspections done?	---	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<u>X</u>	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>X</u>	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	
7. Required certification?	<u>X</u>	—	—	
8. Required signatures?	<u>X</u>	—	—	
(C) Does the owner or operator submit exception reports when needed?	<u>X</u>	—	—	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	—	—	
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	—	—	